1 2 3 4 5 6 7 8		ES DISTRICT COURT RICT OF CALIFORNIA
9 10 11 12 13 14 15 16 17 18	GOATPIX, LLC, a Nevada Limited Liability Company;  Plaintiff, v.  AMAZON.COM SERVICES, LLC, a Delaware Limited Liability Company authorized to do business in California; and DOES 1-10, and each of them, inclusive,  Defendants.	Complaint of plaintiff goatpix LLC FOR 1 COPYRIGHT INFRINGEMENT; AND 2 VICARIOUS AND/OR CONTRIBUTORY COPYRIGHT INFRINGEMENT  DEMAND FOR JURY TRIAL
19 20 21 22 23 24 25 26 27 28	Plaintiff GOATPIX LLC ("Goatpix") for AMAZON.COM SERVICES, LLC ("Amazon "Defendants") hereby alleges as follows:	

**INTRODUCTION** 1 2 1. This is an action for copyright infringement arising out of the knowing and willful actions of 3 Defendants Amazon and DOES 1-10; (collectively, "DEFENDANTS.") 4 I. 5 JURISDICTION AND VENUE 6 2. Jurisdiction 7 This is an action for copyright infringement arising under 17 U.S.C. § 501. 8 This Court has jurisdiction over the subject matter of this action pursuant to 28 U.S.C. §§ 9 1331 and 1338(a) and (b) and 1367(a). 10 3. Venue 11 Venue is proper in this Court pursuant to 28 U.S.C. § 1391(b) and (c) and § 1400(a), because 12 Defendants conducted business in this District, and because Defendants purposely availed 13 themselves of business opportunities in this District. 14 4. Personal Jurisdiction 15 This Court has personal jurisdiction over Defendants because Defendants have purposefully 16 availed themselves of the privileges and protections of doing business in California and in 17 this judicial district, and material elements of Defendants' wrongdoing occurred in California 18 and caused injury to Plaintiff in California. 19 2.0 II. 21 THE PARTIES 22 5. Plaintiff Goatpix was and is at all times a Nevada limited liability company with its 23 principal place of business in Brea, California. 24 6. Plaintiff Goatpix is informed and believes, and based thereon alleges, that Defendant 25 Amazon is, and at all times material to this action was, a Delaware limited liability 26 company, qualified to do business in California, with its principal place of business in

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Seattle, Washington.

- 7. Upon information and belief, Defendants Does 1 through 5, inclusive, manufacturers and/or distributors of products offered for sale on the Amazon Website, which Defendants DOES 1-5 have manufactured, imported, supplied, and distributed apparel and other products bearing unlawful reproductions of Plaintiff's copyrighted image (the "Goatpix Copyrighted Work") without Plaintiff's consent, or have contributed to said infringement. The true names, whether corporate, individual, or otherwise of Defendants DOES 1 through 5, inclusive, are sued herein under fictitious names because their true names and capacities are unknown to Plaintiff. When Plaintiff ascertains the Doe Defendants' true names and capacities, Plaintiff will seek leave to amend this Complaint to insert such true names and capacities. Plaintiff is informed and believes, and based thereon alleges, that each Doe Defendant acted with the other Defendants and is responsible for the harm and damages to Plaintiff alleged herein.
- 8. Upon information and belief, Defendants DOES 6-10, inclusive, are retailers and/or vendors of products offered for sale on the Amazon Website, which Defendants DOES 6-10 have displayed and distributed apparel and other products bearing unlawful reproductions of Plaintiff's copyrighted image (the "Goatpix Copyrighted Work") without Plaintiff's consent, or have contributed to said infringement. The true names, whether corporate, individual, or otherwise of Defendants DOES 6-10, inclusive, are presently unknown to Plaintiff, who therefore sues said Defendants by such fictitious names and will seek leave to amend this Complaint to insert such true names and capacities. Plaintiff is informed and believes, and based thereon alleges, that each Doe Defendant acted with the other Defendants and is responsible for the harm and damages to Plaintiff alleged herein.
- 9. Plaintiff is informed and believes, and based thereon alleges, that each of the Defendants named herein is in some manner responsible for the acts alleged herein and that, at all times mentioned herein, each of the Defendants, including each and every fictitiously named Defendant, was the principal, agent, servant, employee, alter-ego, instrumentality,

representative, co-venturer, and/or partner of each of the other said Defendants, and in doing the things herein alleged, was acting within the course, scope, purpose and knowledge of such agency, employment, alter-ego, instrumentality, representation, co-venture, and/or partnership, and/or for the benefit of each other Defendant, and with the knowledge, permission and consent or with the approval or ratification of each other Defendant, and, as such, share liability with each other with respect to the matters complained of herein.

10. Plaintiff is informed and believes, and based thereon alleges, that at all times relevant hereto, each of the Defendants, including each and every fictitiously named Defendant, conspired with, aided and abetted, and/or acted in concert with each and every other Defendant to harm, injure and damage Plaintiff as alleged herein and, in furtherance of the aforesaid conspiracy or other plan, each and every Defendant engaged in one or more of the overt acts hereinafter alleged.

## III.

## BACKGROUND

## PLAINTIFF GOATPIX AND ITS COPYRIGHTS

- 11. Goatpix owns all rights and interest in a significant number of priceless photographs of NBA players, teams and events.
- 12. The crown jewel of the collection that Goatpix purchased is perhaps one of the most singularly iconic sports images ever captured. It is an image ("mj\_1002") of NBA superstar Michael Jordan, defying gravity, mid-air, during a spectacular moment in the 1988 All Star NBA Slam Dunk Contest:

13. A true and correct copy of mj 1002 is attached hereto as Exhibit "1."

exploitation of the Goatpix Copyrighted work.

Copyright Registration No. VA 2-257-251 was issued on June 11, 2021. A true and correct copy of the copyright registration for mj 1002 is attached hereto as Exhibit "2."

14. Goatpix has filed for, and has received, copyright protection for mi 1002. The resulting U.S.

15. Goatpix thus owns the copyrights in and to this work (the "Goatpix Copyrighted Work").

Goatpix Copyrighted Work, to distribute copies of the Goatpix Copyrighted Work, to display copies of the Goatpix Copyrighted Work, to create products using the Goatpix Copyrighted

16. Under the Copyright Act, Goatpix has the exclusive rights, inter alia, to reproduce the

Work, to authorize or license any such activities in all markets, worldwide, and to control all

17. Goatpix has invested, and continues to invest, substantial sums of money, time, effort, and creative talent to obtain all rights and interest in the Goatpix Copyrighted Work.

18. Goatpix has aggressively enforced (and continues to enforce) their rights under copyright law, and has caused hundreds of infringing products to be removed from the internet, each of which were infringing on the Goatpix Copyrighted Work.

19. In short, Goatpix's business is based entirely upon the copyrighted images owned by them.

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- 20. Sadly, the theft of copyrighted material on the Internet has reached epidemic proportions, and theft is even more pernicious in the sports memorabilia sector, due to the giant margins available by selling stolen product.
- 21. Infringing websites and products such as those operated and created by Defendants exploit material that Goatpix has spent substantial sums of money to obtain, manage, and exploit. The Goatpix Copyrighted Work, as of the writing of this complaint, were being used by Defendants, offered as Defendants' own exclusive work, and sold for significant amounts of money.
- 22. As a result, Goatpix has been deprived of revenue and market share for this iconic image, the market for future sales of this image has been irreparably diluted, and Defendants have enriched themselves on the back of Goatpix' intellectual property. Goatpix has suffered incalculable harm, and in spite of approaching Defendants in good faith, has been rebuffed at every turn by Defendants.
- 23. Unfortunately Defendants' callous disregard for the sanctity of copyright law has left Goatpix no choice but to bring this action.

## IV.

## **DEFENDANTS' BUSINESS AND INFRINGING CONDUCT**

- 24. Defendants, and each of them, created physical and electronic products which directly infringed mj 1002. Defendants then uploaded, hosted and provided the infringing images and products, on infringing websites operated in, or available to, residents of California, websites which have infringed upon the Goatpix Copyrighted Work. Defendants also sold physical memorabilia using mj 1002, online and through their vast network of resellers, including, but not limited to Amazon.com. Exhibit "3" is a true and correct screenshot of the infringing auctions at Amazon.com.
- 25. Defendants had actual knowledge that they were storing and displaying specific Goatpix Copyrighted Works.

- 26. The works stored and displayed by DEFENDANTS were identical reproductions of the Plaintiff copyrighted works, excepting the manipulations and cropping engaged in by the Defendants, and each of them.
- 27. Defendants, and each of them, have ridden on and exploited Plaintiff's coattails and hardearned credibility for their own pecuniary gain, all to the detriment of Plaintiff.
- 28. In every relevant action they took, Defendants acted with a consciousness of guilt.
- 29. Defendants' conduct has caused, and continues to cause, severe and irreparable harm to Plaintiff.
- 30. Upon information and belief, Defendants, and each of them, have committed copyright infringement with actual or constructive knowledge of Plaintiff's rights, and/or in blatant disregard of Plaintiff's rights, such that said acts of copyright infringement were, and continue to be, willful, intentional and malicious, subjecting Defendants, and each of them, to liability for statutory damages under Section 504(c)(2) of the Copyright Act in the sum of up to one hundred fifty thousand dollars (\$150,000.00) per infringement.

## IV.

## AMAZON.COM LOSES ITS SAFE HARBOR PROTECTIONS

- 31. As an actor which asserts that it is an online service provider who hosts content for third parties, Amazon.com regularly claims, and is afforded, "safe harbor" protection from copyright violation actions for products appearing on their platform, pursuant to the Digital Millennium Copyright Act, 17 U.S.C. §512.
- 32. Amazon has (properly) registered an agent with the Unites States Copyright Office for receipt of copyright notices.
- 33. Safe Harbor protection is, however, only afforded to Amazon as long as Amazon "acts expeditiously to remove, or disable access to, the material." 17 U.S.C. §512(c)(1)(A)(iii)

- 34. Goatpix has, through counsel, sent DMCA takedown notices to Amazon.com, through Amazon's registered DMCA agent at copyright@amazon.com, a minimum of 15 times since Goatpix perfected their copyright registration for the Goatpix copyrighted material. Each time until now Amazon has complied promptly and removed the infringing materials.
- 35. On February 24, 2022, Plaintiff's counsel sent Amazon.com, through Amazon's registered DMCA agent email address, a fully compliant DMCA takedown notice<sup>1</sup> for a set of infringing products. Exhibit "4" attached hereto, is a true and correct copy of the takedown notice sent to Amazon.com
- 36. Plaintiff's counsel has previously sent numerous takedown notices (covering hundreds of infringing products) to the same address at Amazon, and Amazon has always complied.

  Inexplicably, in this case, Amazon immediately sent a rejection to Counsel. Exhibit "5", attached hereto, is a true and correct copy of the rejection notice received by Counsel.
- 37. Counsel replied to Amazon, sent another copy of the same (fully compliant) notice, and noted that Amazon's continued refusal to remove these infringing items would result in the loss of Amazon's safe harbor protections, as afforded to Amazon under 17. U.S. C. 512(c). Exhibit X, attached hereto, is a true and correct copy of the note Counsel sent to Amazon.
- 38. Bizarrely, Amazon doubled down and continued to refuse to comply, and left all of the infringing items active in the Amazon.com marketplace. Amazon then doubled down by emailing Counsel yet another refusal. Exhibit "9", attached hereto, is a true and correct copy of this email from Amazon, along with counsel's response.
- 39. As of the writing of this Complaint, all of the infringing items remain live at Amazon. All of the screenshots in Exhibit 37 were captured 24 hours after Counsel received Amazon's second refusal to comply.

<sup>&</sup>lt;sup>1</sup> Fully compliant with all provisions of 17 U.S.C. §512 and substantially identical to all of the previous 15 notices sent by Goatpix' counsel to Amazon

40. By refusing to comply with the requirements of 17 U.S.C. §512, Amazon has lost, and can no longer assert, its safe harbor protections, and is vicariously liable for all of the infringements which it allowed to remain on the Amazon.com platform.

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27 28 **COUNT I** 

## **COPYRIGHT INFRINGEMENT**

(Against All Defendants, and Each of them)

- 41. Plaintiff incorporates by reference all of the above paragraphs of this Complaint as though fully stated herein.
- 42. Plaintiff Goatpix is, and at all relevant times has been, the owner of all right, title, and interest to each of the Goatpix Copyrighted Works.
- 43. Plaintiff has exclusive rights under 17 U.S.C. § 106 to reproduce, prepare derivative works of, distribute copies of, and publicly display the Goatpix Copyrighted Work
- 44. The Goatpix copyrighted work is copyrightable subject matter under 17 U.S.C. § 102(a)(5).
- 45. Plaintiff Goatpix has registered the works, which are the subject of this Complaint, with the United States Copyright Office prior to the acts complained of herein.
- 46. Each of the Goatpix Copyrighted Works consists of material original to Plaintiff.
- 47. Copyright protection is guaranteed once a work is created and exists in a fixed, tangible medium of expression, 17 U.S.C. §104(b)(1), (b)(2).
- 48. Defendants have copied, reproduced, distributed, adapted, and/or publicly displayed the PLAINTIFF Copyrighted Works without the consent or authority of PLAINTIFF, thereby directly infringing PLAINTIFF's copyrights.
- 49. Without Plaintiff's authorization, the Subject Work was reproduced on products and were publicly displayed on, and distributed via, the Amazon Website.
- 50. Defendants, and each of them, had actual knowledge of the infringement of Plaintiff's copyrights.
- 51. Plaintiff provided notice to Amazon in compliance with the DMCA and Amazon

- failed to expeditiously disable access to or remove at least 24 infringing links on the Amazon Website.
- 52. Amazon had actual knowledge of the infringing listings on the Amazon Website.
- 53. In failing to disable and/or remove the infringing links from the Amazon Website after receipt of Plaintiff's DMCA notice, Amazon acted willfully as contemplated by 17 U.S.C. § 504(c)(2).
- 54. Amazon directly infringed Plaintiff's copyrights by continuing to allow public access to the infringing links on the Amazon Website and/or Amazon's server or on servers controlled by Amazon or through access controlled by Amazon to third-party servers, and by continuing to allow sales of a vast array of infringing products.
- 55. Upon information and belief, one or more of the DOE Defendant manufacturers/ distributors has an ongoing business relationship with DOE Defendant retailers, and each of them, and supplied products to said retailers, which products infringed the Subject Work in that said products featured unauthorized print design(s) that were identical or substantially similar to the Subject Work, or were an illegal derivation or modification thereof.
- 56. Upon information and belief, Defendants, and each of them, infringed Plaintiff's copyrights by creating, making, and/or developing directly infringing and/or derivative works from the Subject Work and by producing, distributing and/or selling posters and/or other products which infringe the Subject Work through Amazon's nationwide network.
- 57. Due to Defendants' acts of infringement, Plaintiff has suffered substantial damages to its business, including without limitation, lost profits and lost licensing revenue, in an amount to be established at trial.
- 58. Defendants' conduct constitutes direct infringement of Plaintiff's copyrights and exclusive rights under copyright in the Plaintiff Copyrighted Works, in violation of the United States Copyright Act, 17 U.S.C. §§ 106 and 501.

- 59. Defendants' conduct constitutes infringement and contributory infringement of Plaintiff's copyrights and exclusive rights under copyright in the Plaintiff Copyrighted Works, in violation of the United States Copyright Act, 17 U.S.C. §§ 106 and 501.
- 60. The infringement of Plaintiff's rights in and to each of the Plaintiff Copyrighted Works constitutes a separate and distinct act of infringement.
- 61. Defendants' infringement has been willful, intentional, purposeful, and in reckless disregard of and with indifference to the rights of Plaintiff.
- 62. As a direct and proximate result of the infringements by Defendants of Plaintiff's copyrights and exclusive rights under copyright in the Plaintiff Copyrighted Works, Plaintiff is entitled to his actual damages, and Defendants' profits, pursuant to 17 U.S.C. § 504(b).
- 63. Alternatively, Plaintiff is entitled to statutory damages for willful infringement, pursuant to 17 U.S.C. §504(c)(2), in an amount of \$150,000 per violation.
- 64. Defendants' conduct by infringing is causing and, unless enjoined and restrained by this Court, will continue to cause, great and irreparable injury to Plaintiff that cannot fully be compensated in money. Plaintiff has no adequate remedy at law. Pursuant to 17 U.S.C. § 502, Plaintiff is entitled to injunctive relief prohibiting further infringements of his copyrights.
- 65. Plaintiff further is entitled to their attorneys' fees and costs pursuant to 17 U.S.C. § 505.
- 66. Defendants, and each of them conspired with each other, aided and abetted, conspired, worked with, and otherwise knowingly engaged in all of the above illegal acts.
- 67. Defendants, and each of them, in committing the above acts and omissions, acted willfully, intentionally, maliciously, recklessly, and in conscious disregard of the rights of Plaintiff, all justifying an award of punitive damages in an amount to be adduced at the time of trial.

## COUNT II

VICARIOUS AND/OR CONTRIBUTORY COPYRIGHT INFRINGEMENT

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(Against All Defendants, and Each of Them)

- 68. Plaintiff incorporates by reference all of the above paragraphs of this Complaint as though fully stated herein.
- 69. Upon information and belief, Defendants, and each of them, knowingly induced, participated in, aided and abetted in and profited from the illegal reproduction and/or subsequent sales of posters and other products featuring the Subject Work, as alleged herein.
- 70. Upon information and belief, Defendants, and each of them, are vicariously liable for the infringement alleged herein because they had the right and ability to supervise the infringing conduct, or to stop the infringing conduct, and because they had a direct financial interest in the infringing conduct. By reason of the Defendants' acts of contributory and vicarious infringement as alleged above, Plaintiff has suffered and will continue to suffer substantial damages to its business in an amount to be established at trial, as well as additional general and special damages in an amount to be established at trial.
- 71. Due to Defendants' acts of copyright infringement as alleged herein, Defendants have obtained direct and indirect profits they would not otherwise have realized but for their infringement of the Subject Work. As such, Plaintiff is entitled to disgorgement of Defendants' profits directly and indirectly attributable to Defendants' infringement of Plaintiff's rights in the Subject Work, in an amount to be established at trial.
- 72. Upon information and belief, Defendants, and each of them, have committed acts of copyright infringement, as alleged above, which were willful, intentional and malicious, which further subjects Defendants to liability for statutory damages under Section 504(c)(2) of the Copyright Act in the sum of up to one hundred fifty thousand dollars (\$150,000.00) per infringement. Within the time permitted by law, Plaintiff will make an election between actual damages and statutory damages.

1 PRAYER FOR RELIEF 2 3 WHEREFORE, Plaintiff Goatpix, LLC prays for judgment against Defendants, and each of them, 4 jointly and severally, as follows: 5 6 1. That this Court enter judgment against each Defendant setting forth that the Defendant has 7 infringed Plaintiff's copyright to the Goatpix copyrighted work, pursuant to 17 U.S.C. §501; 8 2. That Defendants, and each of them, and their respective officers, agents, servants, employees, 9 representatives, successors, and assigns, and all persons in active concert or participation 10 with them, be enjoined from: 11 a. Directly or indirectly copying, reproducing, distributing, adapting, selling, importing, 12 creating derivative works from, offering for sale, publicly displaying, or otherwise 13 trafficking in the Goatpix Copyrighted Works; and 14 b. Causing, contributing to, enabling, facilitating or participating in the infringement of 15 any of Plaintiff's copyrights, including without limitation, the Plaintiff Copyrighted 16 Works covered by Plaintiff's copyright registrations; 17 3. That Defendants be ordered to destroy all photographs, documents, media, files, and other 18 items, electronic or otherwise, in their possession, custody, or control, that infringe the 19 copyrights of Plaintiff; 20 4. That Defendants be ordered to cease hosting and/or operating websites that infringe the 21 copyrights of Plaintiff; 22 5. For punitive damages in an amount to be adduced at trial; 23 6. For Plaintiff's actual damages, and for disgorgement of all profits earned by any means

attributable to Defendant's infringement pursuant to 17 U.S.C. § 504(b), in an amount to be

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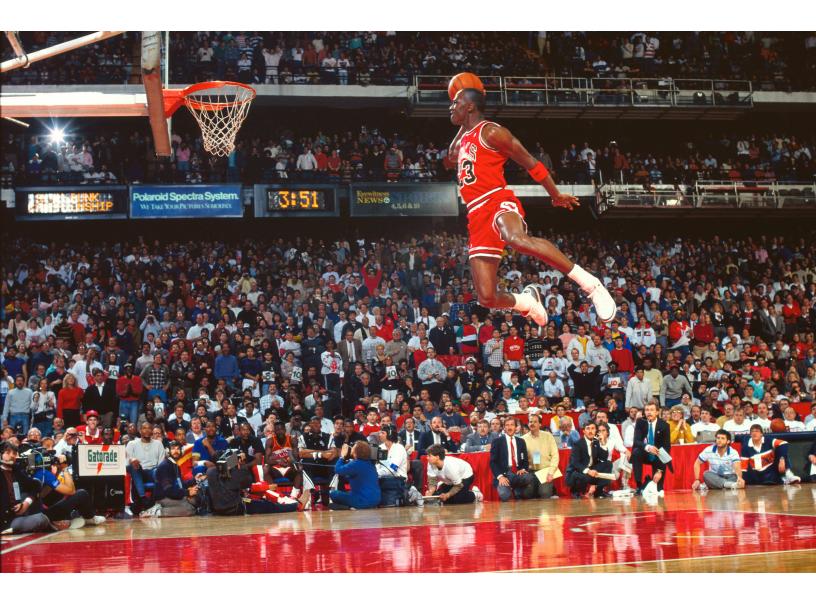
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proven at trial;

1	7. Or if elected before final judgment, for damages for willful infringement, pursuant to 17
2	U.S.C. §504(c),
3	8. For Plaintiff's costs in this action, including reasonable attorneys' fees, pursuant to 17 U.S.C.
4	§ 505;
5	9. For prejudgment interest according to law;
6	10. That all awards be made jointly and severally; and
7	11. For such other and further relief as this Court deems just and proper.
8	
9	Plaintiff hereby demands a jury trial on all issues so triable pursuant to Fed. R. Civ. P. 38 and the
10	7 <sup>th</sup> amendment to the United States Constitution.
11	Dated: April 14, 2022
12	Respectfully Submitted,
13	EVIC Rielley ERIC D. RIDLEY
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15	Attorney for Plaintiff, Goatpix, LLC
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# **EXHIBIT 1**



# **EXHIBIT 2**

## Certificate of Registration



This Certificate issued under the seal of the Copyright Office in accordance with title 17, *United States Code*, attests that registration has been made for the work identified below. The information on this certificate has been made a part of the Copyright Office records.

Registration Number

VA 2-257-251

**Effective Date of Registration:** 

June 11, 2021

**Registration Decision Date:** 

July 02, 2021

been made a part of the Copyright Office records.
Spira Persmatter
United States Register of Copyrights and Director

Title		
	Title of Work:	mj_1002
Comple	etion/Publication	5
	Year of Completion: Date of 1st Publication: Nation of 1st Publication:	1988 March 08, 1998 United States
Author		
60000000000000000000000000000000000000	• Author: Author Created: Work made for hire: Citizen of:	Bill Smith photograph No United States
Copyrig	jht Claimant	
	Copyright Claimant:	Goatpix, LLC 330 W. Birch #201, Brea, CA, 92821, United States

## **Rights and Permissions**

Organization Name: Law Office of Eric Ridley

Transfer statement: By written agreement

Name: Eric Ridley

Email: ridley.eric@gmail.com Telephone: (805)244-5291

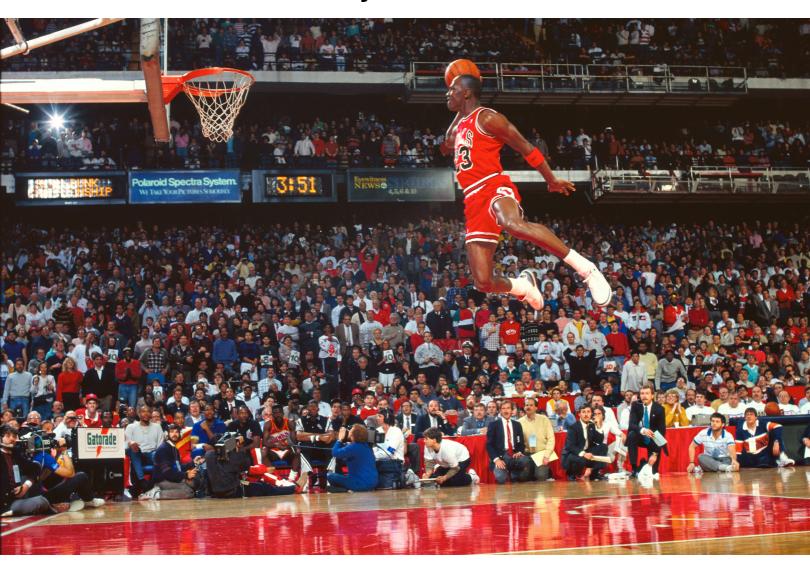
Address: 567 W. Channel Islands Blvd. #210

Port Hueneme, CA 93041 United States

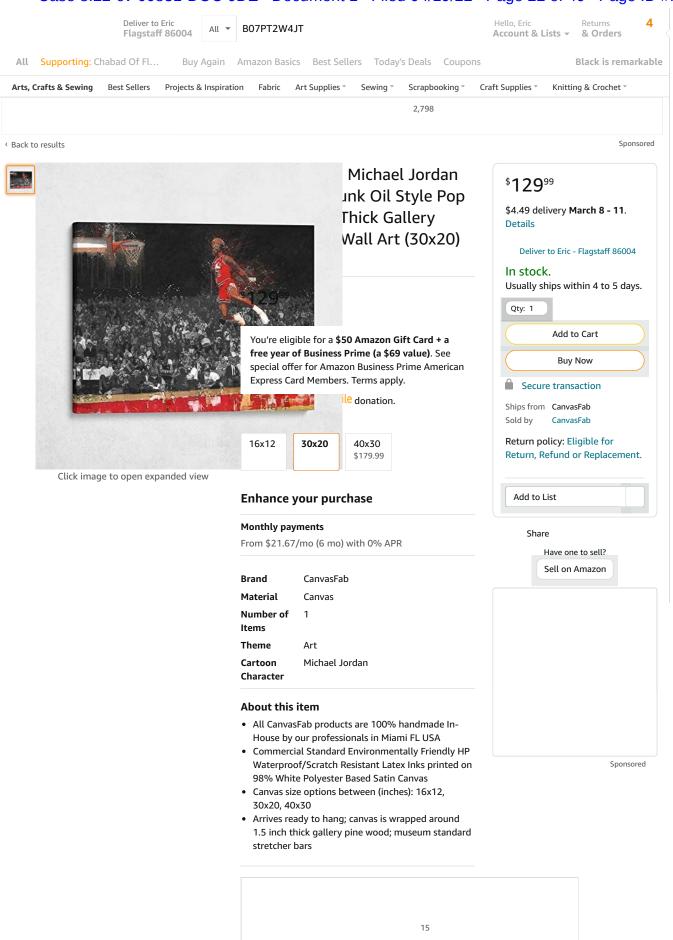
## Certification

Name: Eric Ridley -Date: June 11, 2021

## mj\_1002



# **EXHIBIT 3**



Sponsored

#### **Buy it with**







Total price: \$156.98

Add all three to Cart

Some of these items ship sooner than the others. Show details

- ▼ This item: Gallery Farm | Michael Jordan Free Throw Dunk Oil Style Pop Art | 1.5 Inch Thick Gallery Canvas Print, Wa... \$129.99
- ✓ POP NBA: Bulls Michael Jordan, Multicolor, One Size \$15.00
- ✓ Funko Pop! Boxing: Julio César Chávez \$11.99

#### **Customers who viewed this item also viewed**



Michael Jordan Dunking Poster Classic Dunk from The Free Throw Line Poster Print 15x23...

Amazon's Choice in

Posters & Prints \$18.99 Prime FREE Delivery Thursday, Mar 3



MP Printing Michael Jordan Famous Foul Line Dunk Sports Poster Print 24 x 36 Inches

155

\$12.98



Michael Jordan Wing Slam Dunk Air Basketball Legend Sports Poster Pictures Oil Painting Canvas Prints Artwork New Home Gifts Home...

\$29.35

## Inspired by your recent shopping trends



GoGoArt Roll Unstretched Canvas Print Wall Art Home Decor Photo Big Poster (Not Framed) Michael Jordan NBA Sport...

\$39.00



GoGoArt Roll Unstretched Canvas Print Wall Art Home Decor Photo Big Poster (Not Framed) Michael Jordan NBA Sport... 21

\$17.00



TIMUBA MJ Canvas Wall Art - God of Basketball Poster Pictures for Men Boys Room Decor Gift, Modern #23 Flying Man Dunk Paintings Frame... 21

\$34.98



Basketball Famous Dunk Sports Poster Wall Art Canvas Artwork For Living Room Modern Home Decor Aesthetic Unframed Poster... \$13.99

FREE Delivery



Michael Jordan Dunking Poster Classic Dunk from The Free Throw Line Poster Print 15x23...

Amazon's Choice in

Posters & Prints \$18.99 Prime FREE Delivery

Thursday, Mar 3

## Have a question?

Find answers in product info, Q&As, reviews

Type your question or keyword



Michael Jordan"All-Star Free Throw Line Jam" 16x20 Spotlight Framed Photograph (Eng... \$169.00



Canvas The Goat Mentality Michael Jordan Vertical Poster Wall Art & Wall Decor & Pa... Art,Modern

4

\$41.60



Trends International Michael Jordan-Fly Wall Poster Officially Licensed, 22.375" x ... Paper \$9.28 e aliene

Canvas Michael Jordan 1998 The Last Shot Chicago Bulls Framed Wall Art | Chicago Bu... \$219.20



MJ Canvas Wall Art God of Basketball Canvas Print for Home Wall Decor, Flying Man P... Art,Sports • Canvas

45

Sponsored

\$74.98

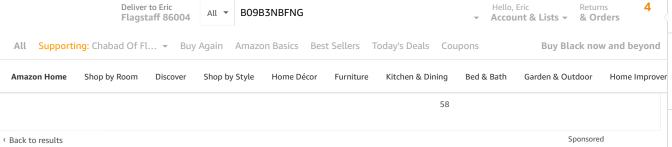
1,299
Add to Cart

## **Customer Questions & Answers**

See questions and answers

## **Customer reviews**

No customer reviews





Michael Jordan **Dunking Poster Classic** Dunk from The Free Throw Line Poster Print 15x23 inch(38cmx58cm) Frameless Rolled

Brand: ARETE SCHOLARS FUND 21 ratings

R Best Seller

Was: \$19.99

& FREE Returns

You're eligible for a \$50 Amazon Gift Card + a free year of Business Prime (a \$69 value). See special offer for Amazon **Business Prime American Express** Card Members. Terms apply.

Eligible for amazonsmile donation.

Cartoon Michael Jordan

Character

Size 23 Inch Mounting Wall Mount

Type

Is framed? No **Orientation** Landscape

#### About this item

- · Great wall decor or perfect gift
- Brand New Item.Great Collectible.
- Positive Motivational Inspirational Decorations for Library, Classroom, Gym, or Office
- High quality poster printing, quality guaranteed!
- Perfect for your home, office, or a

Report incorrect product information.

\$18<sup>99</sup>

& FREE Returns

FREE Prime delivery Thursday, March 3

Extended delivery time: Some low-priced Prime-eligible items, such as this, have an extended delivery window. Common reasons for an extended delivery window include items restricted to ground shipping and items that require extra time to prepare for shipment.

Deliver to Eric - Flagstaff 86004

In Stock. Qty: 1 Add to Cart **Buy Now** Secure transaction Ships from Amazon Sold by Kylie A Moser Return policy: Eligible for Return, Refund or Replacement ☐ Add a gift receipt for easy

Share

returns

Add to List

Have one to sell? Sell on Amazon

34

Sponsored



Subtotal

\$85.96







Roll over image to zoom in



Sponsored

#### Frequently bought together





Total price: \$48.96 Add all three to Cart

These items are shipped from and sold by different sellers. Show details

- ☑ This item: Michael Jordan Dunking Poster Classic Dunk from The Free Throw Line Poster Print 15x23 inch(38cmx58c... \$18.99)
- ☑ Some People Want Michael Jordan Quotes Poster Print 16x25 inch(40cmx63cm) Frameless Rolled \$16.99
- ✓ MP Printing Michael Jordan Famous Foul Line Dunk Sports Poster Print 24 x 36 Inches \$12.98

#### More items to explore



Kobe Bryant 16" x 24" Wall Art Prints, Inspirational Art Poster Picture, Basketball Canvas Painting for bo... 400

\$13.87

FREE Delivery



MP Printing Michael Jordan Famous Foul Line **Dunk Sports Poster Print** 24 x 36 Inches

\$12.98



Rico Industries NBA 3-Foot by 5-Foot Single Sided Banner Flag with Grommets

1,559

\$20.99 Prime FREE Delivery Thursday, Mar 3



Kobe Bryant Wall Art Basketball Player Canvas Wall Art Painting Sports Posters Artwork Home...

262

Posters & Prints \$17.01

FREE Delivery



Subtotal \$85.96

\$22.99

Kobe Bryant 16" x 24" Poster - Inspirational Print for Offices, Walls, Rooms, Dorms, Homes -Great Gift For Basketb...

\$12.98

FREE Delivery

#### 4 stars and above

Sponsored **(** 



Kobe Bean Bryant Poster - The Lakers Basketball Print - WPAP Inspired Poster - Gift... Geometric, Art

239

\$13.99



Kobe Bryant Poster Art of Sport Basketball Posters for Boys Bedroom Prints On...

\$49.00



Basketball art Canvas Painting, Kobe Bryant **Poster Pictures Prints** ,Basketball Wall ...

161

\$10.99



Xxxtentacion 17 Album Cover Art Merch XXX Bad Vibes Forever Skins Trap Music Aesthe...

84

Music • Paper

\$7.99



**Bob Ross Galaxy Painting** Stars Cool Psychedelic Trippy Hippie Decor UV Light Reacti...

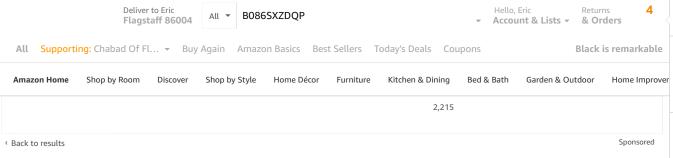
Paper

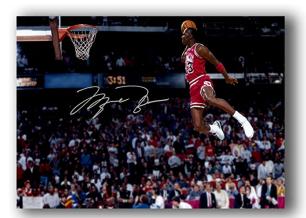
1,431

\$9.99

## Have a question?







Roll over image to zoom in

Flying Dunk
Painting Canvas
Print Wall Art
Basketball Poster
for Home Room
Decor (30x50
cm(Framed))

Michael Jordan

Brand: HomeDC

**%** Checking Prices...

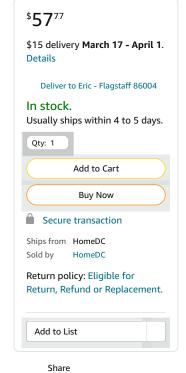
\$57<sup>77</sup>

Coupon: Save an extra 15% when you apply this coupon. Terms

You're eligible for a \$50 Amazon Gift Card + a free year of Business Prime (a \$69 value). See special offer for Amazon Business Prime American Express Card Members. Terms apply.

Eligible for **amazon**smile donation.





Have one to sell?

Sell on Amazon



Subtotal

\$85.96





\$22.99



☑ MP Printing Michael Jordan Famous Foul Line Dunk Sports Poster Print 24 x 36 Inches \$12.98

🛂 Kobe Bryant 16" x 24" Poster - Inspirational Print for Offices, Walls, Rooms, Dorms, Homes - Great Gift For Basketbal... \$12.98

Subtotal \$85.96









#### **Products related to this item**

Sponsored



Wall Collage Kit - Photo Collage Kit For Wall Aesthetic | Grey White Wall Posters F... 16

\$9.99



Cao Gen Decor Art A62850 Wall Art Canvas **Abstract Planet Universe** Space Picture Can... Nature, Abstract • Canvas 1,968

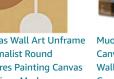
\$45.99

Lake Tahoe CA Canvas Wall Art Print, 60"x20"x1.25" Canvas

13

\$119.99

Canvas Wall Art Unframe Minimalist Round **Pictures Painting Canvas** Paintings Modern ... \$12.80



Muolunna A62269 Canvas Prints Abstract Wall Art Print Paintings Grey and Brown Home... Art, Abstract • Canvas 652

\$59.99

## Inspired by your recent shopping trends



GoGoArt Roll **Unstretched Canvas** Print Wall Art Home Decor Photo Big Poster (Not Framed) Michael Jordan NBA Sport...

\$39.00



GoGoArt Roll **Unstretched Canvas** Print Wall Art Home **Decor Photo Big Poster** (Not Framed) Michael Jordan NBA Sport...

21

\$17.00



TIMUBA MJ Canvas Wall Art - God of Basketball Poster Pictures for Men Boys Room Decor Gift, Modern #23 Flying Man Dunk Paintings Frame...

21

\$34.98



Basketball Famous Dunk Sports Poster Wall Art Canvas Artwork For Living Room Modern Home Decor Aesthetic Unframed Poster...

\$13.99

FREE Delivery



Framed Michael Jordan **Dunk Contest Autograph** Replica Print - Chicago Bulls

\$44.99

## Have a question?

Find answers in product info, Q&As, reviews

Type your question or keyword

#### **Product Description**

Canvas Quality:

Our premium canvas is made of 100% cotton, ensuring longer lifespan and durability. Excellent canvas printing technology makes our products eye-catching and sturdy. Vivid color create the feel of the original nature and masterpiece, bring a immersive experience to you. **Customized Painting:** 

Our canvas prints can also be custom-made to suit your own size, photos or pictures. Welcome to contact us via mail.

#### **Product information**

#### Technical Details Additional Information

ASIN B086SXZDQP

Best Sellers Rank

#2,289,699 in Home & Kitchen (See Top 100 in Home &

Subtotal **\$85.96** 









No customer reviews

**Customer reviews** 

5 star 0%
4 star 0%
3 star 0%
1 star 0%

How are ratings calculated?

Sponsored

## **Customers also viewed these products**



MP Printing Michael Jordan Famous Foul Line Dunk Sports Poster Print 24 x 36 Inches

\$12.98



JUSTBR Canvas Wall Art Basketball Players Pictures Painting Sports Posters Artwork Home Decor for Basketball Fan Memorabilia Gifts Livi...

\$89.99



Michael Jordan Dunking Poster Classic Dunk from The Free Throw Line Poster Print 15x23...

Amazon's Choice in
Posters & Prints
\$18.99
Prime FREE Delivery
Thursday, Mar 3



GoGoArt ROLL Canvas Unstretched Print Wall Art home decor Photo Poster (not Framed) 1998 Michael Jordan Last Shot NBA Sport... 38

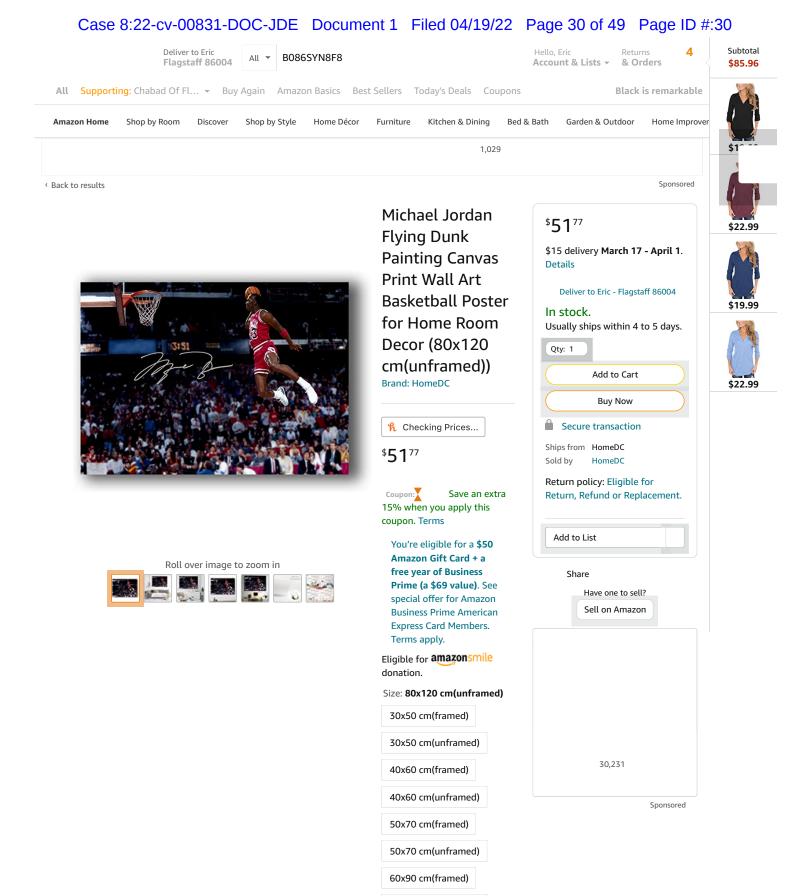
\$17.00



Michael Jordan Wing Slam Dunk Air Basketball Legend Sports Poster Pictures Oil Painting Canvas Prints Artwork New Home Gifts Home...

\$29.35

Sponsored



60x90 cm(unframed)

**80x120 cm(unframed)** 90x140 cm(unframed)

100x160 cm(unframed)

- ▼ This item: Michael Jordan Flying Dunk Painting Canvas Print Wall Art Basketball Poster for Home Room Decor (80x1... \$51.77
- ☑ MP Printing Michael Jordan Famous Foul Line Dunk Sports Poster Print 24 x 36 Inches \$12.98
- ☑ Kobe Bryant 16" x 24" Poster Inspirational Print for Offices, Walls, Rooms, Dorms, Homes Great Gift For Basketbal... \$12.98

## Inspired by your recent shopping trends



GoGoArt Roll Unstretched Canvas Print Wall Art Home Decor Photo Big Poster (Not Framed) Michael Jordan NBA Sport...

\$39.00



GoGoArt Roll Unstretched Canvas Print Wall Art Home Decor Photo Big Poster (Not Framed) Michael Jordan NBA Sport...

21

\$17.00



TIMUBA MJ Canvas Wall Art - God of Basketball Poster Pictures for Men Boys Room Decor Gift, Modern #23 Flying Man Dunk Paintings Frame...

21

\$34.98



Basketball Famous Dunk Sports Poster Wall Art Canvas Artwork For Living Room Modern Home Decor Aesthetic Unframed Poster...

\$13.99

FREE Delivery

Subtotal **\$85.96** 





\$22.99





#### **Customers also viewed these products**



MP Printing Michael Jordan Famous Foul Line Dunk Sports Poster Print 24 x 36 Inches

\$12.98



JUSTBR Canvas Wall Art Basketball Players Pictures Painting Sports Posters Artwork Home Decor for Basketball Fan Memorabilia Gifts Livi...

323

\$89.99



Michael Jordan Dunking Poster Classic Dunk from The Free Throw Line Poster Print 15x23...

Posters & Prints \$18.99

Prime FREE Delivery
Thursday, Mar 3

Amazon's Choice i

GoGoArt ROLL Canvas Unstretched Print Wall

GoGoArt ROLL Canvas Unstretched Print Wall Art home decor Photo Poster (not Framed) 1998 Michael Jordan Last Shot NBA Sport...

\$17.00



Framed Michael Jordan

Replica Print - Chicago

Bulls

\$44.99

**Dunk Contest Autograph** 

37

Michael Jordan Wing Slam Dunk Air Basketball Legend Sports Poster Pictures Oil Painting Canvas Prints Artwork New Home Gifts Home...

10

\$29.35

## Have a question?

Find answers in product info, Q&As, reviews

Type your question or keyword

#### **Product Description**

#### Canvas Quality:

Our premium canvas is made of 100% cotton, ensuring longer lifespan and durability. Excellent canvas printing technology makes our products eye-catching and sturdy. Vivid color create the feel of the original nature and masterpiece, bring a immersive experience to you.

Customized Painting:

Our canvas prints can also be custom-made to suit your own size, photos or pictures. Welcome to contact us via mail.

#### **Product information**

**Technical Details** 

Additional Information

	ASIN	B086SYN8F8
	Best Sellers Rank	#2,289,699 in Home & Kitchen (See Top 100 in Home & Kitchen) #137,028 in Posters & Prints
	Date First Available	April 6, 2020

## Warranty & Support

**Product Warranty:** For warranty information about this product, please click here

#### Feedback

Would you like to tell us about a lower price?







#### **Videos**

Help others learn more about this product by uploading a video!

Upload video

#### **Products related to this item**

Sponsored 🕦



Framed Michael Jordan Dunk Contest Autograph Replica Print - Chicago Bulls

37

\$44.99



Panther Print, Large Canvas Wall Art, Beautiful Living Room Framed Art, Quality Pic... 630

\$89.99



Wallniture Sporta Wall Mounted Ball Storage Sports Ball Holder Rack Display Storage...

3,605

\$10.49



Motorcycle Helmet Bluetooth Headset,Outdoor Headset,Waterproof... 3,396

\$28.99

1,299

Add to Cart

Sponsored

#### **Customer Questions & Answers**

See questions and answers

\$85.96

Subtotal







## **Customer reviews**

How are ratings calculated?

5 star	0%
4 star	0%
3 star	0%
2 star	0%
1 star	0%

No customer reviews

Sponsored

## **Products related to this item**

Sponsored 🕦



Panther Print, Large Canvas Wall Art, Beautiful Living Room Framed Art, Quality Pic... 630

\$89.99



Framed Michael Jordan Dunk Contest Autograph Replica Print - Chicago Bulls

37

\$44.99



Wallniture Sporta Wall Mounted Ball Storage Sports Ball Holder Rack Display Storage...

3,605

\$10.49



Motorcycle Helmet Bluetooth Headset,Outdoor Headset,Waterproof... 3,396

\$28.99

Sponsored

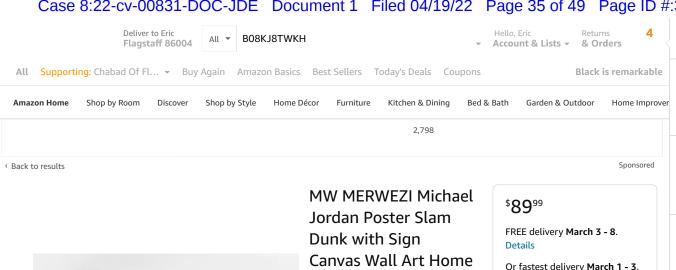
#### Subtotal Deliver to Eric Hello, Eric B088W1Q1MT All ▼ Flagstaff 86004 Account & Lists ▼ & Orders \$85.96 All Supporting: Chabad Of Fl... ▼ Buy Again Amazon Basics Best Sellers Today's Deals Coupons Buy Black now and beyond Back to results Micheal Jordan Famous Dunk \$3900 11x14 Double Matted 8x10 FREE delivery March 4 - 9. Photo Print Reprint Signature Details Autograph Air Jordan Flying A Or fastest delivery March 3 - 8. **Brand: Annies** \$22.99 Details Deliver to Eric - Flagstaff 86004 <sup>♠</sup> Checking Prices... In stock. Usually ships within 3 to 4 days. \$3900 Add to Cart You're eligible for a \$50 Amazon Gift Card + a **Buy Now** free year of Business Prime (a \$69 value). See special offer for Amazon Business Prime American Secure transaction Express Card Members. Terms apply. Ships from Annies Gifts Galore Eligible for amazonsmile donation. Annies Gifts Galore **Brand** Annies Return policy: Eligible for Return, Refund or Replacement. Size 8 x 10 Inch, 11 x 14 Inch Roll over image to zoom in Is framed? Yes Orientation Landscape Add to List Report incorrect product information. Share Sell on Amazon 30 Sponsored **Buy it with**



Some of these items ship sooner than the others. Show details

- ☑ This item: Micheal Jordan Famous Dunk 11x14 Double Matted 8x10 Photo Print Reprint Signature Autogr
- ✓ POP NBA: Bulls Michael Jordan, Multicolor, One Size \$15.00
- ✓ Funko Pop! Golf: Tiger Woods (Red Shirt) \$11.99

More to consider from our brands





**Decor Framed Art** (24"x18" Stretched on Wood)

Brand: MW MERWEZI

1 rating

R Best Seller

\$8999

You're eligible for a \$50 Amazon Gift Card + a free year of Business Prime (a \$69 value). See special offer for Amazon **Business Prime American Express** Card Members. Terms apply.

Eligible for amazonsmile donation.

Size: 24"x18" Stretched on Wood



## **Enhance your purchase**

#### Monthly payments

From \$15.00/mo (6 mo) with 0% APR

**Brand** MW MERWEZI

Material Wood Theme Art

24"x18" Stretched on Size

Wood

Mounting Wall Mount

Type

#### About this item

- · Our products is Made in USA and Hand Made.
- High Quality poly-cotton Canvas 380 gsm
- Real pine wood frame with thickness 1.5 inch
- · Last technology LATEX PRINTER
- · Water-resistant and Ready to hang

Or fastest delivery March 1 - 3. Deliver to Eric - Flagstaff 86004 Only 15 left in stock order soon. Qty: 1 Add to Cart **Buy Now** Secure transaction Ships from CanvasValley

CanvasValley

Return, Refund or Replacement.

Have one to sell?

Sell on Amazon

15

Sponsored

Return policy: Eligible for

Sold by

Add to List

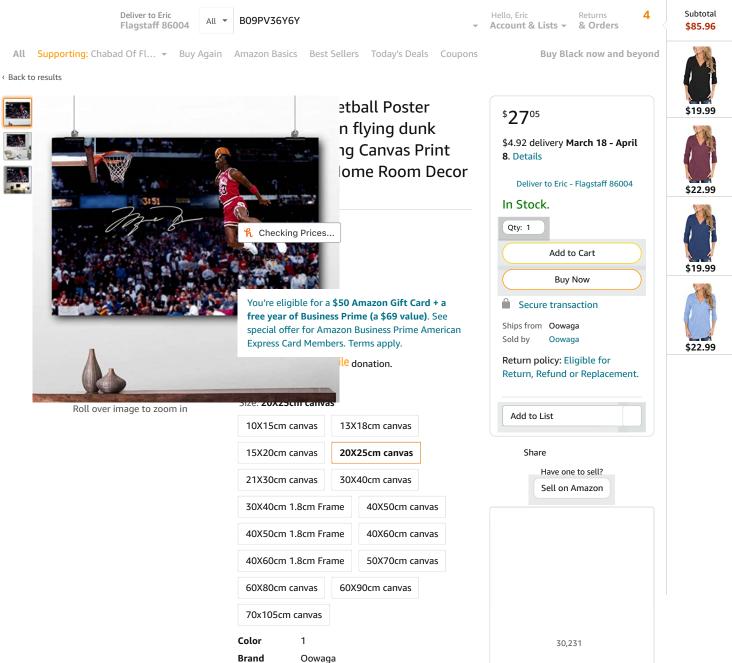
Share



Subtotal

\$85.96





#### About this item

Orientation

Size

- High-definition basketball art print printed on high-quality canvas is vivid and vivid, which increases your love for basketball and an artistic sense
- The unique funny saying canvas print set

20X25cm canvas

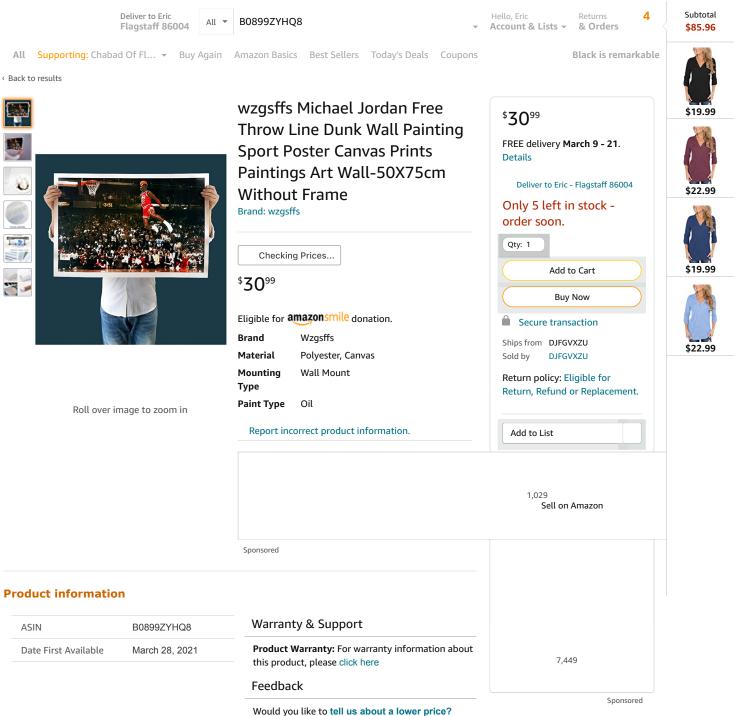
Landscape

- print of canvas is adopted ECO-ink print on canvas, paints are made from eco-friendly materials, easy to clean by damp rag and no smell of oil painting, more safety.
- High Definition Modern Canvas Printings Artwork, strong sense of texture, full of Artistic. The Perfect Wall Decorative Painting Give Your Home Living room, Bedroom, Kitchen, Office, Hotel, Restaurant, Bedroom, Guesthouse, KTV,Gym and so on Add The Elegant Artistic Atmosphere.
- Basketball print are printing on high quality canvas. A perfect choice for wall decoration and home



Sponsored

## 



### Have a question?

Find answers in product info, Q&As, reviews

Type your question or keyword

#### Videos

Help others learn more about this product by uploading a video!

Upload video

# **EXHIBIT 4**

## Eric D. Ridley

Attorney at Law

567 W. Channel Islands Blvd., Ste. 210 Port Hueneme, CA 93041 805.244.5291 888.953.3884 fax ridley.eric@gmail.com

#### February 24, 2022

Copyright Agent Amazon.com Legal Department PO Box 81226 Seattle, WA 98108 Via Email: (Copyright@amazon.com)

Ref: Copyright Claim/DMCA Takedown Demand

Goatpix, LLC

### Dear Director of Compliance:

This office represents Gotapix, LLC, who is the copyright owner of the photograph being infringed at (but not limited to):

**ASIN:** 

B09B3NBFNG

B08KJ8TWKH

B086SYN8F8

B086SXZDQP

B09PV36Y6Y

B07PT2W4JT

**B0899ZYHQ8** 

B088W1Q1MT

I have been instructed by my client to issue this notice of copyright infringement and DMCA takedown demand. It has come to my attention that you or your clients have posted my client's copyrighted image without permission or compensation.

## YOU ARE INSTRUCTED TO REMOVE THE LISTING AS WELL AS THE IMAGE. THE PRODUCTS THEMSELVES ARE INFRINGING.

A copy of the photograph being infringed are included to assist with their removal from the infringing website(s).

This letter is official notification under the provisions of §512(c) of the Digital Millennium Copyright Act ("DMCA") to effect removal of the above-reported infringements. This is the only demand you will receive.

I respectfully request that you immediately remove the specified postings and/or pages, disable access to all images, and prevent the infringer from posting the infringing photographs to your servers in the future.

Please be advised that the DMCA requires you, as a service provider, to "expeditiously remove or disable access to" the infringing photographs upon receiving this notice. Noncompliance may result in a loss of immunity for liability under the DMCA.

I also respectfully request that you provide full contact details of the infringing account to my office immediately, including email and physical contact information, names, and all further information which you may possess regarding the infringing account.

I have a good faith belief that use of the material in the manner complained of here is not authorized by my client, the copyright holder, or the law.

The information provided here is accurate to the best of my knowledge, and I swear, under penalty of perjury, that with respect to this notification, I am authorized to act on behalf of the owner of an exclusive right that is allegedly infringed.

I look forward to your response indicating the actions you have undertaken to resolve this matter.

Very truly yours,

tra Rulley Eric D. Ridley

EDR:nsa

Attachments: 1





# **EXHIBIT 5**

## RE:[CASE 9688560131] Your Amazon.com inquiry

incomplete. We cannot take action on or complete any of your requests. Please resubmit your report with all the required information listed below.

- -- The name and email address of the person submitting the notice, plus any additional contact details.
- -- The rights owner name, if the notice is submitted by an agent of the rights owner.
- -- A physical or electronic signature of the person authorized to act on behalf of the owner of the copyright interest;
- -- A description of the copyrighted work that you claim has been infringed upon;
- -- A description of where the material that you claim is infringing is located on the site;
- -- Your address, telephone number, and email address;
- -- A statement by you that you have a good-faith belief that the disputed use is not authorized by the copyright owner, its agent, or the law; and
- -- A statement by you, made under penalty of perjury, that the above information in your notice is accurate and that you are the copyright owner or authorized to act on the copyright owner's behalf.
- -- Identification of the intellectual property right asserted. This includes a written description or registration number, if applicable. In the case of a copyright complaint alleging the unauthorized use of images, please provide a direct link to the image as it appears on other sites or provide a complete text description of the image content.
- -- Identification of the specific content on Amazon believed to be infringing, by ASIN or URL. If your report is about specific seller listings, please provide a list of sellers. If your report is about text or images on a page describing a product, please identify those images by providing a complete text description of the image content or by including a direct link to the image(s) on the Amazon site. If your report is about text appearing on a page for a product, please include the specific text in question in the Additional Comments field. If your report is that the entire page or product sold via that page infringes, please let us know.
- -- A sample use of the mark.
- -- Identification (description) of the goods/services for which the mark is used.
- -- Date of the first use of the mark in commerce in connection with the goods/services for which the mark is reported.

To learn more about Amazon Intellectual Property policies, please review our Rights Owner Help Content (https://sellercentral.amazon.com/gp/help/external/U5SQCEKADDAQRLZ).

Complaint ID: 9688560131

Sincerely,

To learn more about how Transparency can help proactively protect your brand from counterfeit, please visit the Transparency website (https://brandservices.amazon.com/transparency? ld=NSGoogle\_null). Fill out our contact us form (https://brandservices.amazon.com/transparency/contactus?ld=TRUSCU) and a Transparency team member will reach out to you soon.

Me to copyright@amazon.com

FEB 24

The report I filed was a full and legitimate DMCA takedown. Immediately remove these listings or lose your safe harbor protections. It is attached again to this email for your convenience

Amazon 2022-02-24

PDF

no-replies-appeals@amazon.com to Me

1:03 AM

Hello,

Thank you for your report of infringement. We reviewed your report and determined that it is

### 

incomplete, we cannot take action on or complete any or your requests. Please resubmit your report with all the required information listed below.

- -- A physical or electronic signature of the person authorized to act on behalf of the owner of the copyright interest;
- -- A description of the copyrighted work that you claim has been infringed upon;
- -- A description of where the material that you claim is infringing is located on the site;
- -- Your address, telephone number, and email address;
- -- A statement by you that you have a good-faith belief that the disputed use is not authorized by the copyright owner, its agent, or the law; and
- -- A statement by you, made under penalty of perjury, that the above information in your notice is accurate and that you are the copyright owner or authorized to act on the copyright owner's behalf.

To learn more about Amazon Intellectual Property policies, please review our Rights Owner Help Content (https://sellercentral.amazon.com/gp/help/external/U5SQCEKADDAQRLZ).

### Complaint ID:9688560131

### Sincerely,

# **EXHIBIT 6**

### RE:[CASE 9688560131] Your Amazon.com inquiry

c/clients/manley, dwight - copyright

Thank you for your report of infringement. We reviewed your report and determined that it is incomplete. We cannot take action on or complete any of your requests. Please resubmit your report with all the required information listed below.

- -- The name and email address of the person submitting the notice, plus any additional contact details.
- -- The rights owner name, if the notice is submitted by an agent of the rights owner.
- -- A physical or electronic signature of the person authorized to act on behalf of the owner of the copyright interest;
- -- A description of the copyrighted work that you claim has been infringed upon;
- -- A description of where the material that you claim is infringing is located on the site;
- -- Your address, telephone number, and email address;
- -- A statement by you that you have a good-faith belief that the disputed use is not authorized by the copyright owner, its agent, or the law; and
- -- A statement by you, made under penalty of perjury, that the above information in your notice is accurate and that you are the copyright owner or authorized to act on the copyright owner's behalf.
- -- Identification of the intellectual property right asserted. This includes a written description or registration number, if applicable. In the case of a copyright complaint alleging the unauthorized use of images, please provide a direct link to the image as it appears on other sites or provide a complete text description of the image content.
- -- Identification of the specific content on Amazon believed to be infringing, by ASIN or URL. If your report is about specific seller listings, please provide a list of sellers. If your report is about text or images on a page describing a product, please identify those images by providing a complete text description of the image content or by including a direct link to the image(s) on the Amazon site. If your report is about text appearing on a page for a product, please include the specific text in question in the Additional Comments field. If your report is that the entire page or product sold via that page infringes, please let us know.
- -- A sample use of the mark.
- -- Identification (description) of the goods/services for which the mark is used.
- -- Date of the first use of the mark in commerce in connection with the goods/services for which the mark is reported.

To learn more about Amazon Intellectual Property policies, please review our Rights Owner Help Content (https://sellercentral.amazon.com/gp/help/external/U5SQCEKADDAQRLZ).

Complaint ID: 9688560131

### Sincerely,

To learn more about how Transparency can help proactively protect your brand from counterfeit, please visit the Transparency website (https://brandservices.amazon.com/transparency? ld=NSGoogle\_null). Fill out our contact us form (https://brandservices.amazon.com/transparency/contactus?ld=TRUSCU) and a Transparency team member will reach out to you soon.

### Me to copyright@amazon.com

FEB 24

The report I filed was a full and legitimate DMCA takedown. Immediately remove these listings or lose your safe harbor protections. It is attached again to this email for your convenience

Amazon 2022-02-24

PDF

no-replies-appeals@amazon.com to Me

FEB 25

Hello,

Thank you for your report of infringement. We reviewed your report and determined that it is incomplete. We cannot take action on or complete any of your requests. Please resubmit your report with all the required information listed below.

- -- A physical or electronic signature of the person authorized to act on behalf of the owner of the copyright interest;
- -- A description of the copyrighted work that you claim has been infringed upon;
- -- A description of where the material that you claim is infringing is located on the site;
- -- Your address, telephone number, and email address;
- -- A statement by you that you have a good-faith belief that the disputed use is not authorized by the copyright owner, its agent, or the law; and
- -- A statement by you, made under penalty of perjury, that the above information in your notice is accurate and that you are the copyright owner or authorized to act on the copyright owner's behalf.

To learn more about Amazon Intellectual Property policies, please review our Rights Owner Help Content (https://sellercentral.amazon.com/gp/help/external/U5SQCEKADDAQRLZ).

Complaint ID:9688560131

### Sincerely,